

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

Index No.: _____/19

JOHN DOE,

**Plaintiffs designate
NEW YORK COUNTY
as place of trial.**

Plaintiff,

**The basis of venue is
Defendant's principal
place of business**

-against -

SUMMONS

**GREATER NEW YORK COUNCIL OF THE BOY
SCOUTS OF AMERICA, TEN MILES RIVER SCOUT
CAMP, CAMP AQUEHONGA and BRUCE
DeSANDRE,**

**Plaintiff resides in
Virginia Beach, Virginia**

Defendants.


To the above-named Defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's Attorneys within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case your failure to appear or answer, judgement will be taken for the relief demanded herein.

**A COPY OF THIS SUMMONS WAS FILED WITH THE CLERK OF THE COURT,
NEW YORK COUNTY ON _____ IN COMPLIANCE WITH CPLR §§305(a) AND
306(a).**

Dated: New York, New York
August 14, 2019

MERSON LAW, PLLC

By: 
Jordan K. Merson
Attorneys for Plaintiff
150 East 58th Street 34th Floor
New York, New York 10155
(212) 603-9100

TO:

GREATER NEW YORK COUNCIL OF THE BOY SCOUTS OF AMERICA

475 Riverside Dr., Ste. 600,
New York, NY 10115

-and-

350 5th Avenue, #7820,
New York, New York, 10118.

TEN MILES RIVER SCOUT CAMP

1481 Crystal Lake Rd,
Narrowsburg, NY 12764

CAMP AQUEHONGA

1481 Crystal Lake Rd,
Narrowsburg, NY 12764

BRUCE DeSANDRE

72 Barrow St., Apt. 4A
New York, NY 10014

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

Index No.: _____/19

JOHN DOE,

Plaintiff,

-against -

**VERIFIED
COMPLAINT**GREATER NEW YORK COUNCIL OF THE BOY
SCOUTS OF AMERICA, TEN MILES RIVER SCOUT
CAMP, CAMP AQUEHONGA and BRUCE
DeSANDRE,

Defendants.

-----X
Plaintiff,¹ above named, complaining of the Defendants, by MERSON LAW,

PLLC., respectfully allege(s):

NATURE OF THE CLAIM

1. This is a case of Plaintiff John Doe who was sexually abused as a teenager by Bruce DeSandre ("DeSandre") at and of Ten Miles River Scout Camp ("Ten Miles"), Camp Aquehonga ("Camp") and Greater New York Council of the Boy Scouts of America.
2. At all times herein mentioned, DeSandre was the Camp Director of the Camp.
3. At all times herein mentioned, the Camp was owned, controlled and operated by the Greater New York Council of the Boy Scouts of America ("Boy Scouts") and Ten Miles River Scout Camp
4. At all times herein mentioned, DeSandre was an agent, servant and/or employee of the Boy Scouts, Ten Miles and Camp.

¹ Plaintiff uses a pseudonym because he is a victim of a sex crime pursuant to N.Y. Civ. Rights § 50-b and other statutory and common law principles.

5. Despite DeSandre's reputation as a sexual predator, he continued to be employed as a camp director under the supervision and control of the Boy Scouts, Ten Miles and Camp.
6. The Camp, Ten Miles and the Boy Scouts knew or should have known that DeSandre sexually abused children at the Camp and/or that he had a propensity to sexually abuse the children at the Camp.
7. In or about the summer of 1977, Plaintiff was a sixteen-year-old camper and/or counselor in training at the Camp and/or Ten Miles where DeSandre was the camp director. DeSandre sexually assaulted Plaintiff repeatedly by forcing him to perform oral sex on him and anally raping him.
8. It was common knowledge among the staff members of the Camp, Ten Miles and the Boy Scouts, that DeSandre did this to Plaintiff and other children, but instead of doing anything to protect Plaintiff, the agents, servants and/or employees of Camp, Ten Miles and Boy Scouts laughed at Plaintiff. In fact, DeSandre frequently abused Plaintiff when he was on "CQ" duty, which was commonly referred to as "Camp Queer".
9. Plaintiff brings this lawsuit to recover for the emotional and physical suffering he incurred because of the negligence of the Greater New York Council of the Boy Scouts of America, Ten Miles River Scout Camp and Camp Aquehonga and to make sure no other young man is forced to suffer the abuse and physical and mental trauma he felt and continues to feel.
10. Plaintiff additionally brings this lawsuit to recover for the emotional and physical suffering he occurred due to the predatory, intentional and malicious sexual actions of Bruce DeSandre directed at him and make sure no other child is forced to suffer the abuse and physical and mental trauma he felt and continues to feel.

PARTIES

11. At all times herein mentioned Defendant **GREATER NEW YORK COUNCIL OF THE BOY SCOUTS OF AMERICA** was a not for profit corporation incorporated in the State of New York and by virtue of the laws of the State of New York.
12. At all times herein mentioned, Defendant **GREATER NEW YORK COUNCIL OF THE BOY SCOUTS OF AMERICA** was located at 350 5th Avenue, #7820, New York, New York, 10118.
13. At all times herein mentioned, Defendant **BRUCE DeSANDRE** was a Camp Director operating under the direction and control of Defendant **GREATER NEW YORK COUNCIL OF THE BOY SCOUTS OF AMERICA**, and its agents, servants and/or employees.
14. At all times herein mentioned, Defendant **BRUCE DeSANDRE** was an agent, servant and/or employee of Defendant **GREATER NEW YORK COUNCIL OF THE BOY SCOUTS OF AMERICA**.
15. At all times herein mentioned Defendant **TEN MILES RIVER SCOUT CAMP** was a not for profit corporation incorporated in the State of New York and by virtue of the laws of the State of New York.
16. At all times herein mentioned, Defendant **TEN MILES RIVER SCOUT CAMP** was located at 1481 Crystal Lake Road, Narrowsburg, New York 12764.
17. At all times herein mentioned, Defendant **BRUCE DeSANDRE** was a Camp Director operating under the direction and control of Defendant **TEN MILES RIVER SCOUT CAMP**, and its agents, servants and/or employees.

18. At all times herein mentioned, Defendant **BRUCE DeSANDRE** was an agent, servant and/or employee of Defendant **TEN MILES RIVER SCOUT CAMP**.
19. At all times herein mentioned, Defendant **TEN MILES RIVER SCOUT CAMP** was operated by and under the control of Defendant **GREATER NEW YORK COUNCIL OF THE BOY SCOUTS OF AMERICA**.
20. At all times herein mentioned, Defendant **GREATER NEW YORK COUNCIL OF THE BOY SCOUTS OF AMERICA** and Defendant **TEN MILES RIVER SCOUT CAMP** were agents, servants, employees and/or alter egos of each other.

FACTS OF THE CASE

21. Defendants **GREATER NEW YORK COUNCIL OF THE BOY SCOUTS OF AMERICA, TEN MILES RIVER SCOUT CAMP** and **CAMP AQUEHONGA's** negligence and recklessness caused Defendant **BRUCE DeSANDRE** to have access to young men, including on company and/or camp premises, without proper supervision, despite their knowledge that Defendant **BRUCE DeSANDRE** sexually abused children and/or had the propensity to sexually abuse children and therefore are responsible for the injuries that Plaintiff incurred because but for Defendants **GREATER NEW YORK COUNCIL OF THE BOY SCOUTS OF AMERICA, TEN MILES RIVER SCOUT CAMP** and **CAMP AQUEHONGA's** negligence, Plaintiff would not have suffered the mental and physical anguish inflicted by Defendant **BRUCE DeSANDRE**. Defendants **GREATER NEW YORK COUNCIL OF THE BOY SCOUTS OF AMERICA, TEN MILES RIVER SCOUT CAMP** and **CAMP AQUEHONGA's** gross negligence, reckless, wanton and/or willful conduct supports punitive liability, and they failed to adequately supervise Defendant **BRUCE DeSANDRE**.

22. Defendant **BRUCE DeSANDRE** sexually assaulted Plaintiff while Plaintiff at **GREATER NEW YORK COUNCIL OF THE BOY SCOUTS OF AMERICA, TEN MILES RIVER SCOUT CAMP** and **CAMP AQUEHONGA**. The Defendants **GREATER NEW YORK COUNCIL OF THE BOY SCOUTS OF AMERICA, TEN MILES RIVER SCOUT CAMP** and **CAMP AQUEHONGA** failed to remove Defendant **BRUCE DeSANDRE** from his position as a camp director or to take any steps to keep the dangerous predator away from the young men of the camp.
23. During the summer of 1977, DeSandre repeatedly raped Plaintiff and forced him to perform oral sex on him on Camp, Ten Miles, and Boy Scouts premises.
24. Prior to Plaintiff's employment with Camp, Ten Miles and Boy Scouts, DeSandre befriended Plaintiff's mother and manipulated her into trusting him to be alone with Plaintiff under the guise that he was an older brother because he was aware that Plaintiff's father had passed away.
25. DeSandre assigned Plaintiff to "CQ" duty which was referred to among the Camp's staff as "Camp Queer". The person on CQ duty had to sleep on a mattress in the office across from DeSandre's office, where he often slept.
26. The first time Plaintiff was sexually abused by DeSandre, Plaintiff was on CQ duty, he woke up to DeSandre unzipping his sleeping bag. DeSandre laid next to plaintiff rubbing his shoulders with his hand. DeSandre then moved to the head of the mattress to stroke Plaintiff's hair. Then, DeSandre removed Plaintiff's sleeping back and moved his head down to Plaintiff's crotch, pulled Plaintiff's gym shorts off and began performing oral sex on Plaintiff. DeSandre then grabbed Plaintiff's Penis and clamped his legs around Plaintiff's head so that he could not move. DeSandre pulled down his pants and

forcefully shoved his penis into Plaintiff's mouth and forced Plaintiff to perform oral sex on him.

27. The next morning, DeSandre's tent mate told Plaintiff "good job" and hit Plaintiff's buttocks.
28. On another occasion, while Plaintiff was sleeping during his day off, DeSandre entered his tent, threw off Plaintiff's blanket, laid behind Plaintiff, pulled off Plaintiff's pants, and digitally penetrated Plaintiff's anus. Plaintiff said no, but DeSandre continued to pin Plaintiff down on his cot and shoving his face into his pillow so that he couldn't breathe. DeSandre violently and forcefully raped Plaintiff. When he was finished, he merely told Plaintiff not to be late to lunch, reinforcing his dominance, power and authority as Camp Director.
29. The Boy Scouts of America claims to be "a program for young people that builds character, trains them in responsibilities of participating citizenship and develops personal fitness", however, Plaintiff's experience with the camps operated by Defendant **GREATER NEW YORK COUNCIL OF THE BOY SCOUTS OF AMERICA** including Defendants **TEN MILES RIVER SCOUT CAMP** and **CAMP AQUEHONGA** proved to be a forum for the open sexual exploitation of young boys at the hands of adults who were also their supervisors.
30. As a result of the actions of Defendant **BRUCE DeSANDRE**, Mr. Doe felt and continues to feel ashamed, embarrassed and humiliated.
31. As such, Plaintiff suffered catastrophic and lifelong injuries as a result of Defendants **GREATER NEW YORK COUNCIL OF THE BOY SCOUTS OF AMERICA**, **TEN MILES RIVER SCOUT CAMP** and **CAMP AQUEHONGA's** negligence in

undertaking a duty to keep its employees, including children, of its camp(s) safe from predators and failing to act in accord with that duty by allowing Defendant **BRUCE DeSANDRE**, a known predator, to continue his role where he would continue to have the opportunity to prey on young men.

AS AND FOR A FIRST CAUSE OF ACTION FOR NEGLIGENCE

AS FOR GREATER NEW YORK COUNCIL OF THE BOY SCOUTS OF AMERICA

32. Plaintiffs repeat, reiterate and reallege each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 31., inclusive, with the same force and effect as if hereinafter set forth at length.
33. At all times mentioned herein, Defendant **GREATER NEW YORK COUNCIL OF THE BOY SCOUTS OF AMERICA** owed a duty of care to keep the children of its camps safe from sexual abuse by its Camp Directors and/or other adult employees under its supervision, including on company and/or camp premises, and control that ultimately befell the Plaintiff, and they had a duty to supervise Defendant **BRUCE DeSANDRE**.
34. At all times mentioned herein, Defendant **GREATER NEW YORK COUNCIL OF THE BOY SCOUTS OF AMERICA** and/or its agents, servants and/or employees breached the above-stated duty in a negligent, reckless, willful and wanton manner, and caused Plaintiff to be sexually assaulted.
35. As a result of the negligence of Defendant **GREATER NEW YORK COUNCIL OF THE BOY SCOUTS OF AMERICA** and/or its agents, servants and/or employees, Plaintiff was caused serious personal injuries, emotional distress, mental pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.

36. By reason of the foregoing, Plaintiff is entitled to compensatory damages from Defendants in such sums as a jury would find fair, just and adequate.
37. By reason of the foregoing, Plaintiff is entitled to punitive damages from Defendants in such sums as a jury would find fair, just and adequate.
38. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
39. This action falls within exceptions to Article 16 of the C.P.L.R.

AS AND FOR A SECOND CAUSE OF ACTION FOR NEGLIGENCE

AS FOR TEN MILES RIVER SCOUT CAMP

40. Plaintiffs repeat, reiterate and reallege each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 39., inclusive, with the same force and effect as if hereinafter set forth at length.
41. At all times mentioned herein, Defendant **TEN MILES RIVER SCOUT CAMP** owed a duty of care to keep the children of its camps safe from sexual abuse by its Camp Directors and/or other adult employees under its supervision, including on company and/or camp premises, and control that ultimately befell the Plaintiff, and they had a duty to supervise Defendant **BRUCE DeSANDRE**.
42. At all times mentioned herein, Defendant **TEN MILES RIVER SCOUT CAMP** and/or its agents, servants and/or employees breached the above-stated duty in a negligent, reckless, willful and wanton manner, and caused Plaintiff to be sexually assaulted.
43. As a result of the negligence of Defendant **TEN MILES RIVER SCOUT CAMP** and/or its agents, servants and/or employees, Plaintiff was caused serious personal injuries,

emotional distress, mental pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.

44. By reason of the foregoing, Plaintiff is entitled to compensatory damages from Defendants in such sums as a jury would find fair, just and adequate.
45. By reason of the foregoing, Plaintiff is entitled to punitive damages from Defendants in such sums as a jury would find fair, just and adequate.
46. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
47. This action falls within exceptions to Article 16 of the C.P.L.R.

AS AND FOR A THIRD CAUSE OF ACTION FOR NEGLIGENCE

AS FOR CAMP AQUEHONGA

48. Plaintiffs repeat, reiterate and reallege each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 47., inclusive, with the same force and effect as if hereinafter set forth at length.
49. At all times mentioned herein, Defendant **CAMP AQUEHONGA** owed a duty of care to keep the children of its camps safe from sexual abuse by its Camp Directors and/or other adult employees under its supervision, including on company and/or camp premises, and control that ultimately befell the Plaintiff, and they had a duty to supervise Defendant **BRUCE DeSANDRE**.
50. At all times mentioned herein, Defendant **CAMP AQUEHONGA** and/or its agents, servants and/or employees breached the above-stated duty in a negligent, reckless, willful and wanton manner, and caused Plaintiff to be sexually assaulted.

51. As a result of the negligence of Defendant **CAMP AQUEHONGA** and/or its agents, servants and/or employees, Plaintiff was caused serious personal injuries, emotional distress, mental pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
52. By reason of the foregoing, Plaintiff is entitled to compensatory damages from Defendants in such sums as a jury would find fair, just and adequate.
53. By reason of the foregoing, Plaintiff is entitled to punitive damages from Defendants in such sums as a jury would find fair, just and adequate.
54. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
55. This action falls within exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A FOURTH CAUSE OF ACTION FOR NEGLIGENT HIRING,
RETENTION AND SUPERVISION AS TO GREATER NEW YORK COUNCIL OF
THE BOY SCOUTS OF AMERICA**

56. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 55., inclusive, with the same force and effect as if hereinafter set forth at length.
57. Defendant **GREATER NEW YORK COUNCIL OF THE BOY SCOUTS OF AMERICA**, had a duty to supervise and prevent known risks of harm to the children of its camps by its Camp Directors.
58. Defendant was negligent in hiring, retaining and supervising their personnel, such as Defendant **BRUCE DeSANDRE**, who were careless, unskillful, negligent, reckless and acted in a willful and wanton manner in not possessing the requisite knowledge and skill

of Camp Directors and other camp supervisors who should have properly been supervising the Camp Directors to ensure the safety of the children and employees of the camps.

59. Defendant **GREATER NEW YORK COUNCIL OF THE BOY SCOUTS OF AMERICA** knew or should have known Defendant **BRUCE DeSANDRE** sexually abused and/or had the propensity to sexually abuse children and did nothing to stop it, and failed to supervise Defendant **BRUCE DeSANDRE**.
60. As a result of such negligent hiring, supervising and retention, Plaintiff was caused to suffer serious personal injuries, emotional distress, conscious pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
61. By reason of the foregoing, Plaintiff is entitled to compensatory damages from Defendants in such sums as a jury would find fair, just and adequate.
62. By reason of the foregoing, Plaintiff is entitled to punitive damages from Defendants in such sums as a jury would find fair, just and adequate.
63. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
64. This action falls within exceptions to Article 16 of the C.P.L.R.

AS AND FOR A FIFTH CAUSE OF ACTION FOR NEGLIGENT HIRING,

RETENTION AND SUPERVISION AS TO TEN MILES RIVER SCOUT CAMP

65. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 64., inclusive, with the same force and effect as if hereinafter set forth at length.

66. Defendant **TEN MILES RIVER SCOUT CAMP**, had a duty to supervise and prevent known risks of harm to the children of its camps by its Camp Directors.
67. Defendant was negligent in hiring, retaining and supervising their personnel, such as Defendant **BRUCE DeSANDRE**, who were careless, unskillful, negligent, reckless and acted in a willful and wanton manner in not possessing the requisite knowledge and skill of Camp Directors and other camp supervisors who should have properly been supervising the Camp Directors to ensure the safety of the children and employees of the camps.
68. Defendant **TEN MILES RIVER SCOUT CAMP** knew or should have known Defendant **BRUCE DeSANDRE** sexually abused and/or had the propensity to sexually abuse children and did nothing to stop it, and failed to supervise Defendant **BRUCE DeSANDRE**.
69. As a result of such negligent hiring, supervising and retention, Plaintiff was caused to suffer serious personal injuries, emotional distress, conscious pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
70. By reason of the foregoing, Plaintiff is entitled to compensatory damages from Defendants in such sums as a jury would find fair, just and adequate.
71. By reason of the foregoing, Plaintiff is entitled to punitive damages from Defendants in such sums as a jury would find fair, just and adequate.
72. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
73. This action falls within exceptions to Article 16 of the C.P.L.R.

AS AND FOR A SIXTH CAUSE OF ACTION FOR NEGLIGENT HIRING,

RETENTION AND SUPERVISION AS TO CAMP AQUEHONGA

74. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 73., inclusive, with the same force and effect as if hereinafter set forth at length.
75. Defendant **CAMP AQUEHONGA**, had a duty to supervise and prevent known risks of harm to the children of its camps by its Camp Directors.
76. Defendant was negligent in hiring, retaining and supervising their personnel, such as Defendant **CAMP AQUEHONGA**, who were careless, unskillful, negligent, reckless and acted in a willful and wanton manner in not possessing the requisite knowledge and skill of Camp Directors and other camp supervisors who should have properly been supervising the Camp Directors to ensure the safety of the children and employees of the camps.
77. Defendant **CAMP AQUEHONGA** knew or should have known Defendant **BRUCE DeSANDRE** sexually abused and/or had the propensity to sexually abuse children and did nothing to stop it.
78. As a result of such negligent hiring, supervising and retention, Plaintiff was caused to suffer serious personal injuries, emotional distress, conscious pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
79. By reason of the foregoing, Plaintiff is entitled to compensatory damages from Defendants in such sums as a jury would find fair, just and adequate.

80. By reason of the foregoing, Plaintiff is entitled to punitive damages from Defendants in such sums as a jury would find fair, just and adequate.
81. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
82. This action falls within exceptions to Article 16 of the C.P.L.R.

AS AND FOR THE SEVENTH CAUSE OF ACTION FOR NEGLIGENT INFLICTION
OF EMOTIONAL DISTRESS AS TO GREATER NEW YORK COUNCIL OF THE
BOY SCOUTS OF AMERICA

83. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 82., inclusive, with the same force and effect as if herein set forth at length.
84. Defendant **GREATER NEW YORK COUNCIL OF THE BOY SCOUTS OF AMERICA** and their agents, servants and/or employees, knew or reasonably should have known that the failure to properly advise, supervise and hire Defendant **BRUCE DeSANDRE**, the Camp Director who sexually abused Plaintiff, would and did proximately result in physical and emotional distress to Plaintiff.
85. Defendant **GREATER NEW YORK COUNCIL OF THE BOY SCOUTS OF AMERICA** and their agents, servants and/or employees knew or reasonably should have known that the sexual abuse and other improper conduct would and did proximately result in physical and emotional distress to Plaintiff.
86. Defendant has the power, ability, authority and duty to intervene with and/or stop the improper conduct that resulted in Plaintiff being sexually abused by Defendant **BRUCE DeSANDRE**.

87. Despite said knowledge, power and duty, Defendant negligently failed to act so as to stop, prevent, and prohibit the improper conduct that resulted in Defendant **BRUCE DeSANDRE** sexually abusing Plaintiff.
88. By reason of the foregoing, Plaintiff is entitled to compensatory damages from Defendants in such sums as a jury would find fair, just and adequate.
89. By reason of the foregoing, Plaintiff is entitled to punitive damages from Defendants in such sums as a jury would find fair, just and adequate.
90. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
91. This action falls within exceptions to Article 16 of the C.P.L.R.

AS AND FOR THE EIGHTH CAUSE OF ACTION FOR NEGLIGENT INFLECTION
OF EMOTIONAL DISTRESS AS TO TEN MILES RIVER SCOUT CAMP

92. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 91., inclusive, with the same force and effect as if herein set forth at length.
93. Defendant **TEN MILES RIVER SCOUT CAMP** and their agents, servants and/or employees, knew or reasonably should have known that the failure to properly advise, supervise and hire Defendant **BRUCE DeSANDRE**, the Camp Director who sexually abused Plaintiff, would and did proximately result in physical and emotional distress to Plaintiff.
94. Defendant **TEN MILES RIVER SCOUT CAMP** and their agents, servants and/or employees knew or reasonably should have known that the sexual abuse and other

improper conduct would and did proximately result in physical and emotional distress to Plaintiff.

95. Defendant has the power, ability, authority and duty to intervene with and/or stop the improper conduct that resulted in Plaintiff being sexually abused by Defendant **BRUCE DeSANDRE**.

96. Despite said knowledge, power and duty, Defendant negligently failed to act so as to stop, prevent, and prohibit the improper conduct that resulted in Defendant **BRUCE DeSANDRE** sexually abusing Plaintiff.

97. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

98. This action falls within exceptions to Article 16 of the C.P.L.R.

**AS AND FOR THE NINTH CAUSE OF ACTION FOR NEGLIGENT INFLICTION OF
EMOTIONAL DISTRESS AS TO CAMP AQUEHONGA**

99. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 98., inclusive, with the same force and effect as if herein set forth at length.

100. Defendant **CAMP AQUEHONGA** and their agents, servants and/or employees, knew or reasonably should have known that the failure to properly advise, supervise and hire Defendant **BRUCE DeSANDRE**, the Camp Director who sexually abused Plaintiff, would and did proximately result in physical and emotional distress to Plaintiff.

101. Defendant **BRUCE DeSANDRE** and their agents, servants and/or employees knew or reasonably should have known that the sexual abuse and other improper conduct would and did proximately result in physical and emotional distress to Plaintiff.

102. Defendant has the power, ability, authority and duty to intervene with and/or stop the improper conduct that resulted in Plaintiff being sexually abused by Defendant **BRUCE DeSANDRE**.
103. Despite said knowledge, power and duty, Defendant negligently failed to act so as to stop, prevent, and prohibit the improper conduct that resulted in Defendant **BRUCE DeSANDRE** sexually abusing Plaintiff.
104. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
105. This action falls within exceptions to Article 16 of the C.P.L.R.

AND AS FOR THE TENTH CAUSE OF ACTION FOR ASSAULT

AS TO BRUCE DeSANDRE

106. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 105., inclusive, with the same force and effect as if herein set forth at length.
107. Defendant **BRUCE DeSANDRE** predatory, abusive, manipulative and unlawful acts against Mr. Doe, created a reasonable apprehension in Mr. Doe of immediate harmful or offensive contact to Plaintiff's person, all of which were done intentionally by Defendant **BRUCE DeSANDRE** to Plaintiff without plaintiff's consent.
108. As a direct and proximate result of the aforementioned assault, Plaintiff has sustained in the past, and will continue to sustain in the future, serious and severe psychological injuries and emotional distress, mental anguish, embarrassment and humiliation.
109. As a direct and proximate result of the aforementioned assaults, Plaintiff has incurred medical expenses and other economic damages, and will now be obligated to expend

sums of money for medical care and attention in effort to cure himself of his injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

110. By reason of the foregoing, Plaintiff is entitled to compensatory damages from Defendant **BRUCE DeSANDRE** in such sums a jury would find fair, just and adequate, and the Plaintiff, Mr. Doe, is further entitled to punitive and exemplary damages from Defendant **BRUCE DeSANDRE** in such sums as a jury would find fair, just and appropriate to deter said Defendant and others from future similar misconduct.
111. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
112. This action falls within exceptions to Article 16 of the C.P.L.R.

AND AS FOR THE ELEVENTH CAUSE OF ACTION FOR BATTERY

AS TO BRUCE DeSANDRE

113. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 112., inclusive, with the same force and effect as if herein set forth at length.
114. When Mr. Doe was approximately seventeen years old, Defendant **BRUCE DeSANDRE** confined Mr. Doe in his tent and unlawfully sexually abused him by fondling Mr. Doe's penis and forcing him to perform oral sex on Defendant **BRUCE DeSANDRE**, and raped him.
115. Defendant **BRUCE DeSANDRE's** unlawful, abusive, manipulative, and predatory acts against Mr. Doe, amounted to a series of harmful and offensive contacts to Plaintiff's

person all of which were done intentionally by Defendant to Plaintiff without Plaintiff's consent.

116. As a direct and proximate result of the aforementioned batteries, Plaintiff has sustained in the past, and will continue to sustain in the future, psychological injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.
117. By reason of the foregoing, Plaintiff is entitled to compensatory damages from Defendant **BRUCE DeSANDRE** in such sums a jury would find fair, just and adequate, and the Plaintiff, Mr. Doe, is further entitled to punitive and exemplary damages from Defendant **BRUCE DeSANDRE** in such sums as a jury would find fair, just and appropriate to deter said Defendant and others from future similar misconduct.
118. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
119. This action falls within exceptions to Article 16 of the C.P.L.R.

**AS FOR A TWELFTH CAUSE OF ACTION FOR INTENTIONAL
INFLICTION OF EMOTIONAL DISTRESS AGAINST BRUCE DeSANDRE**

120. Plaintiff repeats reiterates, and reallages each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 119., inclusive, with the same force and effect as if hereafter set forth at length.
121. Defendant **BRUCE DeSANDRE** engaged in outrageous conduct towards Plaintiff with the intention to cause, or with reckless disregard for the probability of causing, Plaintiff to suffer severe emotional distress by sexually assaulting him while he was under his supervision.

122. As a proximate result of the aforementioned assaults, batteries, and other violations committed against Plaintiff, he has suffered and continues to suffer extreme mental distress, humiliation, anguish, and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.
123. Defendant **BRUCE DeSANDRE** committed the acts alleged herein maliciously, fraudulently, and oppressively with the wrongful intention of injuring Plaintiff from an improper and evil motive amounting to malice and in conscious disregard of Plaintiff's rights, entitling Plaintiff to recover punitive damages in amounts to be proven at trial.
124. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
125. This action falls within the exceptions to Article 16 of the C.P.L.R.

AS AND FOR A THIRTEENTH CAUSE OF ACTION FOR FALSE IMPRISONMENT
AGAINST BRUCE DeSANDRE

126. Plaintiff repeats reiterates, and reallages each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 125., inclusive, with the same force and effect as if hereafter set forth at length.
127. In the summer of 1977, Defendant unlawfully captured Mr. Doe and held him against his will, while being sexually assaulted, leaving him unable to move or escape the sexual assault he endured at the hands of the Defendant.
128. Defendant intended to confine Plaintiff.
129. Plaintiff was conscious of the confinement.
130. Plaintiff did not consent to the confinement.

131. Defendant's confinement of Plaintiff was not otherwise privileged, and therefore was unlawful.
132. As a direct and proximate result of the aforementioned false imprisonment, Plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.
133. As a direct and proximate result of the aforementioned false imprisonment, Plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure himself of his injuries and to alleviate his pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.
134. Mr. Doe continues to be unable to pursue his usual activities and employment all due to the physical, psychological and emotional injuries and damage he sustained due to the aforementioned false imprisonment.
135. By reason of the foregoing, Plaintiff is entitled to compensatory damages from Defendant in such sums as a jury would find fair, just and adequate, and the Plaintiff, is further entitled to punitive and exemplary damages from Defendant in such sums as a jury would find fair, just and appropriate to deter said Defendant and others from future similar misconduct.
136. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
137. This action falls within the exceptions to Article 16 of the C.P.L.R.

WHEREFORE, Plaintiff demands judgement against Defendant in such sum as a jury would find fair, adequate and just.

Dated: New York, New York
August 14, 2019

MERSON LAW, PLLC

By: 
Jordan K. Merson
Attorney for Plaintiffs
150 East 58th Street 34th Floor
New York, New York 10155
(212) 603-9100

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

Index No.:

_____/19

JOHN DOE,

Plaintiff,

-against -

ATTORNEY
VERIFICATIONGREATER NEW YORK COUNCIL OF THE BOY
SCOUTS OF AMERICA, TEN MILES RIVER SCOUT
CAMP, CAMP AQUEHONGA and BRUCE
DeSANDRE,

Defendants.

-----X

JORDAN K. MERSON, an attorney duly admitted to practice in the Courts of New York State, and a member of the firm MERSON LAW, PLLC., attorneys for the Plaintiffs in the within action, hereby affirms under penalty of perjury:

That he has read the within complaint and knows the contents thereof, and that the same is true to his own knowledge, except as to the matters therein stated to be alleged upon information and belief, and that as to those matters he believes it to be true.

That the sources of his information and knowledge are investigations and records in the file.

That the reason this verification is made by affirmant and not by the Plaintiff is that the Plaintiff is not within the County where the attorney has his office.

Dated: New York, New York
August 14, 2019



JORDAN K. MERSON

Index No.

Year 2019

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

JOHN DOE,

Plaintiff (s),

- against -

GREATER NEW YORK COUNCIL OF THE BOY SCOUTS
OF AMERICA, TEN MILES RIVER SCOUT CAMP, CAMP
AQUEHONGA and BRUCE DeSANDRE

Defendant(s),

SUMMONS AND VERIFIED COMPLAINT

Merson Law, PLLC.

Attorneys for Plaintiff(s)

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To: All Parties
